

EXHIBIT 3

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

In Re the Application of NATALIA
POTANINA

Civil Action No. _____

For an Order to Take Discovery
Pursuant

to 28 U.S.C. § 1782(a)

**DECLARATION OF BRIAN SUMMERFIELD
IN SUPPORT OF APPLICATION UNDER 28 U.S.C. § 1782(a)**

BRIAN SUMMERFIELD declares as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney at law duly admitted to practice before the courts of the State of Michigan and the Eastern District of Michigan. I am a member at Bodman PLC, attorneys for petitioner Natalia Potanina. I make this declaration in support of Mrs. Potanina's application for an order to take discovery in the Eastern District of Michigan pursuant to 28 U.S.C. § 1782.

2. Mrs. Potanina has also made applications in the Southern District of New York, the Eastern District of New York, the Eastern District of Virginia, the Northern District of Texas, the Southern District of Texas, the Western District of Pennsylvania and the District of Montana for orders to take discovery from entities and individuals residing or found in those districts, and those courts have granted

Mrs. Potanina's applications. *See* S.D.N.Y. Case No. 14-Misc.-31, E.D.N.Y. Case No. 14-Misc.-127, E.D.Va. Case No. 14-Misc.-00005, N.D. Tex. Case No. 14-Misc.-00003, S.D. Tex. Case No. 14-Misc.-00429, W.D. Pa. Case No. 14-Misc.-00050, D. Mont. Case No. 14-Misc.-01; *see also* attached hereto as Exhibit A true and correct copies of the signed orders from the district courts.

3. A true and correct copy of the Michigan Department of Licensing and Regulatory Affairs' record of Entity Details and 2013 Annual Report for Cosmopolitan Travel & Tours Inc. ("Cosmopolitan") is attached hereto as Exhibit B. The Entity Details show that Cosmopolitan has an address of 5767 W. Maple Rd Ste. 100, W. Bloomfield, MI 48322. The 2013 Annual Report shows that Nikolai Atanassov is the resident agent for Cosmopolitan.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 28, 2014 in Detroit, Michigan.

/s/ Brian C. Summerfield
Brian Summerfield